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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
TRENTON VICINAGE**

In re:

Karen Waldorf

Chapter 13 Debtor

Case No. 19-13417

Chapter 13

Hon. Christine M. Gravelle

**DECLARATION OF ERIC WALDORF**

**Eric Waldorf**, of full age, declares as follows under penalty of perjury and pursuant to 28 U.S.C. §1746:

1. I am an individual resident of the State of New Jersey and the respondent to the motion filed in the within matter.
2. As such, I have personal knowledge of the facts set forth in this declaration, which I make in partial opposition to the motion of Karen Waldorf seeking to compel certain actions and for sanctions.
3. I acknowledge the Court's prior order directing my cooperation with respect to Ms. Waldorf's attempt to modify the mortgage on the house that was our marital residence.
4. I did not receive the emails relating to the second mortgage modification because I was seriously injured in a motorcycle accident and was generally out of circulation until recently.
5. On April 2, 2020, I was in a serious motorcycle accident, and was in the Intensive Care Unit at Capital Health in Trenton until June, 2020 and thereafter was in a stepdown rehabilitation facility until mid-July, 2020.

6. After that, I was convalescent and very strongly medicated for the intense pain caused by my injuries, and have been in and out of the hospital for surgeries to repair the damage.
7. I am willing to cooperate and my attorney is bringing (or will have brought by the time the motion is heard) all necessary documents to me to sign and return to either the lender or counsel as needed for the first mortgage depending on my medical appointments and his calendar.
8. As to the first mortgage, my attorney and I thought that the first mortgage was dealt with and all materials had been provided.
9. With this being said the Order of this court provided that I am not required to give the or Ms. Waldorf any additional financial information beyond that provided in 2017 as part of my filing or the divorce proceedings, though I will sign off on any loan modification agreement she gives me. I am not required to provide a 4506T, my income information or any other financials to Ms. Waldorf and I am not willing to do so.
10. Ms. Waldorf is asking for sanctions and attorneys fees. I am presently completely disabled due to the accident and surviving on disability payments and the generosity of my current partner. I cannot afford \$500, much less the \$5000 she is asking for. Asking for sanctions here is not tailored to deter bad behavior and frankly I have no ability to pay a sanction.
11. As I am more than willing to comply with the Court's order and sign off on any loan modification, though based on certain prior conduct, I am not willing to provide Ms. Waldorf with a limited power of attorney to execute a Loan Modification agreement.

**I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND INFORMATION. I UNDERSTAND THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE WILLFULLY FALSE. I AM SUBJECT TO PENALTIES OF PERJURY.**

Dated: September 29, 2020

/s/Eric Waldorf  
**ERIC WALDORF**